

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

Art Tyrone Easterling

Plaintiff

v.

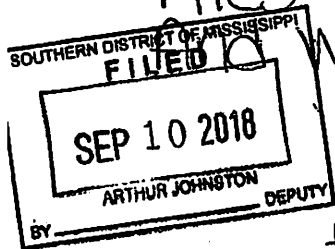
CIVIL ACTION NO. 3:18-cv-00490-HTW-LRA

Mississippi Correctional Services et al

Defendant

MOTION TO AMEND COMPLAINT

Comes now Plaintiff, Art Tyrone —
— Easterling In the manner of Pro, se And
Files This His Motion To Amend Complaint —
Would show unto The Court The Following:



I

Accordingly TO Rankin County
Jail Administration, Lieutenant Daniel
Barnett's Grievance Hearing Report —
— Response TO Plaintiff Easterling —
(Dated 07/26/2018) — stated That,
[Medical Department Has scheduled
All necessary Appointments for Treatment —
of Medical Conditions Listed In Grievance —
Except Hep. B which Has never Been
Mentioned In Medical Files As Positive;
Medical File says no Past History —
of Hep. B.] — End quotes Written Response
(Grievance Hearing Report) By Lieutenant Daniel Barnett
1 of 8 Pages.

II

Where With Being In Accordance To Plaintiff Easterling's Initial Filed Complaint, Into The Court On 07/25/2018 Since about 07/14/2018 until This Present Day And Date 08/31/2018-

- Mississippi Correctional services et al -
- Has yet Failed To Provide Significant Medical Treatment And Medications -
- For Plaintiff Easterling In Regard Of His Initial Requesting Complaint of -
- Treatment For H.I.V. Positive For AIDS -
- And Hepatitis-B, Though Plaintiff - Easterling had signed consentment - of (For) The Release Of Any/All Medical Records And Medical (Files) Dictations -
- From Various Hospital Within The - Jackson, Mississippi Area, Being The -
- Locations (Sittings) In Which Plaintiff - Easterling Had Both Been Diagnosed And Treated For The Afore Said - Above -
- Medical Health - Short Comings Illnesses.
 Notes See/ Review Easterling's
- Medical Record Files History @ - Rankin County Jail Detention Center; And With Mississippi Correctional Services Acting As The Facility Health Care Providers

III

As Relating To Lieutenant Daniel—
 Barnett's Grievance Hearing
 Report—Response—To Plaintiff Easterling,
 He Quoted In Writing: [Medical Department
 Has Scheduled All Necessary Appointments
 For Treatment of Medical Conditions Listed—
 In Grievance Except Hep B. Which has
 Never Been mentioned In medical Files
 As Positive. Medical Files says no past
 History of Hep. B]

As For The Mississippi Correctional
 Services et al and Medical Staff Employees
 -Treating or Evaluating Plaintiff Easterling
 For Hepatitis-B, Mississippi Correctional
 Services et al—Medical staff members—
 -Failed yet, Refused To Retrieve Plaintiff
 Easterling's Pre Existing medical Record—
 Files From The University Hospital of—
 Jackson, ms. Though The Plaintiff Signed—
 Consentment For The Release of Any/All
 Medical Record Files (History) From The
 Aforesaid Health Care Provider, which Had
 Formerly Diagnosed And Treated Plaintiff
 The same. As For Treatment of Plaintiff
 Easterling's Left Shoulder (Re-Implanted
 Hardware Distal Plate) Though Mississippi
 Correctional Services et al—Medical staff
 members Possessed (Held) significant —

— Pre Existing Medical Record Files
(History) And Medical — (Surgeon's)
Dictations Relating To Plaintiff
Easterling's Initial Injury, Initial —
Surgery, Initial Medications And
A Best Significant Approach To
Better Treat Plaintiff Easterling; Mississippi
Correctional Service et al — Obviously
Failed To Treat Or Recommend
A License Orthopedic Doctor As
Relating —

III

Paragraph Continues @
Page no. 5 of 8 Pages
(Just after this page)

~~ATE~~

To Particular Hardware (Distal Plate)

@ Plaintiff Easterling's upper Left shoulder, nor has The Plaintiff Received Medical Treatment or Blood/Lab Assessments Relating To His Initial Court Complaint (Filed July 25, 2018) Regarding Pre-Existing Suffering Of Hepatitis B.

IV

The Same, Regarding The Plaintiff, (Easterling's) Complaint Regarding Aforesaid Implanted Hardware (Distal Plate) Assembly, where he do presently suffers Limited Left upper Arm and Shoulder motor Range (up and Downward) And Numbness @ Left Arm (with much Pain on a 24 hour Period basis) @ Left - Lower Arm, Left Elbow, Left Hand and Left Fingers; and where Plaintiff Easterling Had File His Complaint (Initial Court Complaint Filed/Dated July 25 2018) Regarding The Fact That Mississippi Correctional Services et al had Not (But Failed) To Render significant medical Treatment And medications Regarding The Plaintiffs Requesting For HIV Positive For AIDS and Hepatitis B, ———— The Only Treatment

Treatment
For

That The Plaintiff had Received is where On August 1 2018 The Plaintiff had Been Transported To A Particular out Patient Health Care clinic within Canton Mississippi.

In Which Health Care Affiliates Drew
Numerous (approx 7) Small Tubes of
Blood From The Plaintiff's (Easterling)
Arm, Like, In a Lab/Clinical Assessment-
Manner. Now Since Time, Being 08/1/2018.
No Further Medical Treatment or Clinical-
Assessment of (Blood)-out comes -
Has come about or Any such -
Findings or Solutions Been Brought
To This The Plaintiff, Art Tyrone Easterling's
Attention.

V

Wherefore The Same, Leaving
The Plaintiff With NO Certainty of
Medical Treatment, nor no such -
Advance Anticipation of Forecoming
Health Care Solutions, which
Would've (or could've) Substained
(Held Fast) The Plaintiff's Health -
Had He Obtained Significant Health
Care Treatment In A Timely manner.

VI

Therefore, With All Contained
(Written) Within The Above (5) Five
Paragraphs Being True, And with
The Truth Being Based upon medical -
Denialship, Time Delays, and overall -
Medical Negligence By The Mississippi
6 of 8 Pages.

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Correctional Services et al and Employed
Staff Members @ Rankin County Jail
Detention Center, Plaintiff Easterling
DO File This His Motion To Amend
(Merge) This His Motion Along With
His Original (Initial) Relief Complaint
Entitled Relief

VII

Whereat, As for money Damages
Located @ paragraph (G) of Plaintiff
Easterling Initial Relief (Complaint)
Section, This The Plaintiff, Art Tyrone-
Easterling seeks for An Additional
(125,000.00) one Hundred And _____
Twenty Five Thousand Dollars To
To Amend (merge) along with his
Initial Relief Complaint statement -
TO Total TO The sum of (225,000.00)
Two Hundred And Twenty Five Thousand
Dollars for Denial of significant
Medical Health Care, continuous
Time Delay of professional medical
Treatment And Medications And Oversee
Medical Negligence AS A Hold.

VIII

In conclusion, This The Plaintiff,
Art Tyrone Easterling DO NOT Request
For any other charges To Be Granted
7 of 8 Pages

Within This His Motion To Amend
Complaint Nor Any Further changes
Within Any Paragraphs of his
Initial Written Filed Complaint
Dated and Signed July 25, 2018

Wherefore with All Premises
Considered, This The Plaintiff,
Art Tyrone Easterling Ends This
His Motion To Amend Complaint.

Signed This 30th Day of August,
2018.

I Declare (or certify, verify
or state) under Penalty of
Perjury That The foregoing
Is True.

Juanmao Zlate
Witness

ID# 191196

Art Easterling
Signature of Plaintiff

Walter J. [Signature]
Witness

ID# 185827

Jarvis Bibb

ID# B41535

Phonetic Bibb
Witness

ID# 2018080263

CERTIFICATE OF SERVICE

I Art Tyrone Easterling #12430,
Do Hereby Certify That I Have
on This Day Delivered By Hand
A True And Correct Copy of
The Foregoing Motion To Amend
Complaint.

This The 30 Day of August,
2018.

Jamir Bullock ID-84535
Witness
Jamir Bullock ID-84535
Witness

Art Tyrone Easterling #12430
Plaintiff Signature